

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD KATZ

Plaintiff

v.

NATIONAL BOARD OF MEDICAL
EXAMINERS, et al.

Defendants

CIVIL ACTION
NO. 3:15-cv-1187

(MARIANI, J.)
(SAPORITO, M.J.)

**FILED
SCRANTON**

MAY - 3 2016

PER 

DEPUTY CLERK

DEFENDANTS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

For the reasons set forth in the accompanying memorandum of law, defendants, the National Board of Medical Examiners (NBME) and the Federation of State Medical Boards (FSMB), respectfully request an Order authorizing them to file documents under seal. The documents in question are Exhibits 3, 5, 6, 8, 9, 13 and 21(b) to defendants' motion for summary judgment, filed on May 2, 2016. The exhibits contain records or narrative information relating to plaintiff's mental health.

RESPECTFULLY SUBMITTED,


/s/ Michael E. Sacks

Neil J. Hamburg

Michael E. Sacks

HAMBURG & GOLDEN, P.C.

Pa. I.D. Nos. 32175, 39774

1601 Market Street, Suite 3310

Philadelphia, PA 19103-1443

(215) 255-8590

hamburgnj@hamburg-golden.com

sacksme@hamburg-golden.com

Attorneys for Defendants,

The National Board of Medical Examiners and the
Federation of State Medical Boards of the United
States

HAMBURG & GOLDEN, P.C.

Attorneys

1601 Market Street, Suite 3310
Philadelphia, PA 19103-1443

(215) 255-8590

Facsimile: (215) 255-8583

sacksme@hamburg-golden.com

James P. Golden

Neil J. Hamburg

Michael E. Sacks

Jane C. Silver

Maureen P. Holland

Catherine Berryman

Writer's Direct Dial:

215-255-8586

May 2, 2016

Clerk, U.S. District Court
Middle District of Pennsylvania
235 N. Washington Avenue, Room 101
Scranton, PA 18501-1148

Re: Katz v. National Board of Medical Examiners
U.S.D.C. for M.D.Pa., No. 3:15-cv-1187

Dear Sir or Madam:

Neil Hamburg and I represent the defendants, the National Board of Medical Examiners (NBME) and the Federation of State Medical Boards (FSMB).

I am enclosing for filing Defendants' Motion for Leave to File Documents Under Seal, together with Exhibits 3, 5, 6, 8, 9 and 13 to Defendants' motion for summary judgment, which are in a sealed envelope. Defendants filed their motion for summary judgment on May 2, 2016, through the Court's electronic filing system. In our electronic filing, Exhibits 3, 5, 6, 8, 9 and 13 contained only a page saying "FILED UNDER SEAL."

Please time-stamp and return a copy for our records. Thank you for your attention to this matter.

(noted
mm)

Sincerely,



Michael E. Sacks

MES:clf

Enclosure

By Federal Express

cc: Richard Katz (w/ encl.)

Neil J. Hamburg, Esquire

FedEx

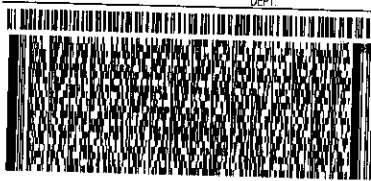
ORIGIN ID RECA (215) 255-8590
MICHAEL E. SACKS, ESQUIRE
HAMBURG & GOLDEN PC
1801 MARKET STREET
SUITE 3310
PHILADELPHIA, PA 19103
UNITED STATES US

SHIP DATE: 02 MAY 16
ACTWGT: 2.00 LB
CAD: 100857351AWSX2600

TO CLERK
USDC FOR MIDDLE DISTRICT OF PA
235 N. WASHINGTON AVENUE
ROOM 101
SCRANTON PA 18501

(215) 255-8590
NY
PO

REF: NEMEKATZ
DEPT:



FedEx
Express



REL#
3785346

TUE - 03 MAY 10:30A
PRIORITY OVERNIGHT

TRK#
0201 7829 7069 4765

EQ AVPA

18501
PA-US ABE



677 1 10:30 4765 05.03 B
FZ

This AWB label should not be printed completely on one page use the "shrink to fit" or "whole page" option on your page settings, or change all the page margins to 0.7 cm. Please call your local office for further assistance if required.

USE ONLY THE UNITED STATES LABELS FOR SHIPPING TO THE UNITED STATES OF AMERICA

Align bottom of Peel and Stick Airbill or Pouch here.

Align top of FedEx Express® Shipping Label here.

Fold along dotted line to close.